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Attorneys for Plaintiffs DORA SOLARES
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DORA SOLARES,

Plaintiff,

v.

RALPH DIAZ, et al.,

Defendants.

Case No. 1:20-cv-00323-LHR-BAM

**JOINT REQUEST FOR LEAVE TO TAKE
DEPOSITION OF JAIME OSUNA
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 30(a)(2)(B); AND
[PROPOSED] ORDER THEREON**

Hon. Lee H. Rosenthal

COME NOW Plaintiff Dora Solares and Defendants Burnes, Gallemore, Gamboa, Garcia, Loza, Maytubby, Munoz, and Pena and Defendant Silva and hereby submit the following joint request in the above-listed matter. The parties request leave to take the deposition of Jaime Osuna, who is incarcerated at CSP-Corcoran, located at 4001 King Avenue, Corcoran, CA 93212. This request is made pursuant to Federal Rule of Civil Procedure 30(a)(2)(B), which provides that a party must obtain leave of court if the deponent is confined in prison. The deposition of Jaime

1 Osuna may be taken in person, with remote appearance via videoconference permitted, and the
2 deposition to be recorded by a certified videographer.

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4 Dated: May 22, 2025

LAW OFFICES OF ERIN DARLING

6 By: /s/
7 Erin Darling,
8 Attorneys for Plaintiff Dora Solares

9 Dated: May 22, 2024

Respectfully submitted,

10 ROB BONTA
11 Attorney General of California
12 JON S. ALLIN
13 Supervising Deputy Attorney General

14 By: /s/
15 JEREMY DUGGAN
16 Deputy Attorney General
17 *Attorneys for Defendants*
18 *Burnes, Pena, Loza, Munoz, Gamboa, and*
19 *Garcia*

20 Dated: May 22, 2024

Respectfully submitted,

21 ANDRADA & ASSOCIATES

22 By: /s/ Lynne G. Stocker
23 LYNNE G. STOCKER
24 *Attorneys for Defendant Silva*

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1 IT IS HEREBY ORDERED that leave of court for the taking of Jaime Osuna's deposition
2 is GRANTED. The deposition of Jaime Osuna may be taken in person, with remote appearance
3 via videoconference permitted, and the deposition to be recorded by a certified videographer.

4 IT IS SO ORDERED.

5 Dated: May ___, 2025
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8 Lee H. Rosenthal
9 Senior United States District Judge
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